

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 06-45-JJF
	:	
	:	
AMANDA VELEZ,	:	
	:	
Defendant.	:	

**MOTION FOR CONTINUANCE OF CHANGE OF PLEA HEARING**

Defendant, Amanda Velez, by and through her undersigned counsel, Eleni Kousoulis, hereby moves the Court for an order continuing the change of plea hearing in this case. In support of the motion, the defense submits as follows:

1. Ms. Amanda Velez is currently scheduled for a change of plea on October 12, 2006 at 1:00 p.m.
2. Ms. Velez has a doctor's appointment on October 12, 2006 at 2:00 p.m. that is important for her to make and she is unable to re-schedule it. It is respectfully requested that Ms. Velez's change of plea hearing be continued to allow her the opportunity to keep her doctor's appointment.
3. AUSA Doug McCann does not oppose this request for a continuance.
4. After speaking with the Court's chambers, defense counsel was informed that the

Court is available to hold this hearing on October 13, 2006 at 1:00 p.m. All parties are available at this date and time.

5. The parties agree that all time up until the new hearing date will be excludable under the Speedy Trial Act.

WHEREFORE, for all the above reasons, the defense respectfully requests that the Court re-schedule the change of plea hearing in this matter to October 13, 2006 at 1:00 p.m.

Respectfully Submitted,

/s/  
\_\_\_\_\_  
Eleni Kousoulis, Esquire  
Acting Federal Public Defender  
704 King Street, Suite 110  
Wilmington, Delaware 19801  
Attorney for Defendant Amanda Velez

DATED: October 10, 2006

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
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Plaintiff,	:	
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v.	:	Criminal Action No. 06-45-JJF
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AMANDA VELEZ,	:	
	:	
Defendant.	:	

**CERTIFICATE OF SERVICE**

Undersigned counsel certifies that a copy of Defendant Motion for Continuance of Change of Plea Hearing is available for public viewing and downloading and was electronically delivered on October 10, 2006, to:

Doug McCann, Esquire  
Assistant U.S. Attorney  
1007 Orange Street  
Suite 700, P.O. Box 2046  
Wilmington, DE 19899-2046

/s/ \_\_\_\_\_  
Eleni Kousoulis, Esquire  
Acting Federal Public Defender  
704 King St., Suite 110  
Wilmington, Delaware 19801  
Attorney for Defendant Amanda Velez

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AMANDA VELEZ,	:	
	:	
Defendant.	:	

**ORDER**

The Court having considered Defendant Velez's Motion For Continuance of Change of Plea Hearing and good cause having been shown therefore,

IT IS HEREBY ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2006 that the Change of Plea Hearing in this case be re-scheduled for the \_\_\_\_\_ day of \_\_\_\_\_, 2006 at \_\_\_\_\_ a.m./p.m.

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Honorable Joseph J. Farnan  
United States District Court